UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
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JUN 2 6 2018

Dawson Lasseter
Chief Engineer, Air Quality Division
Oklahoma Department of Environmental Quality
707 North Robinson, P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677

Re: Applicability Determination – National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 C.F.R. Part 63, for Stationary Reciprocating Internal Combustion Engines (RICE), Subpart ZZZZ, at the ONEOK Field Services Company, L.L.C. (ONEOK) Antioch Booster Station (DEQ Facility ID: 1498) located in Garvin County, Oklahoma; Operating Permit 2016-0093-TVR3 and Construction Permit No. 2011-144-C (M-1).

Dear Mr. Lasseter:

This letter is in response to your May 11, 2015, request for an applicability determination for a project at the ONEOK Antioch Booster Station. Specifically, you request a determination on whether "at the conclusion" of the construction activities authorized by Construction Permit 2011-144-C (M-1), issued on July 1, 2015, the new engines at the Booster Station will be subject to the major or area source requirements under 40 C.F.R. Part 63 Subpart ZZZZ ("RICE NESHAP").

As stated in the ONEOK Antioch Booster Station's Construction Permit and as indicated in 40 C.F.R. § 63.6590(b)(3)(i), the nine 600-horsepower (hp) Cooper Bessemer GMV-6 engines (two-stroke, lean burn engines installed in 1948) were not subject to any requirements under the RICE NESHAP, based on the type of engine and date of installation. Operation of these engines resulted in formaldehyde emissions that exceeded the major source threshold for a single HAP (i.e., 10 TPY) [1]. The Construction Permit authorized the removal of the Cooper Bessemer GMV-6 engines (removed from service in July 2015) and installation of five new 1,775-hp Caterpillar G3606LE TA engines.

The primary HAP from the new Caterpillar engines (EU IDs C-1.2, C-2.2, C-3.2, C-4.2, C-5.2) is formaldehyde. The new engines are subject to federally enforceable limits (FELs) to ensure that total facility formaldehyde emissions will be below 10 TPY.[2] The facility-wide aggregate controlled HAP emissions do not exceed the major source threshold of 25 TPY of all HAP combined.[3] Therefore, once the activities authorized by the construction permit were completed and the new engines subject to the FELs were installed, the facility was classified as

[1] See p. 2 and p. 18, ODEQ Memorandum from Tom Richardson to Phillip Fielder *"Evaluation of Permit Application No. 2011-144-C (M-1)"* (June 29, 2015).
[2] See Operating Permit 2016-0093-TVR3, issued on April 17, 2017.
[3] See Operating Permit 2016-0093-TVR3, issued on April 17, 2017.

an area source of HAPs.

EPA agrees with the Oklahoma Department of Environmental Quality that the five new engines are subject to the area source requirements for a new stationary RICE under 40 C.F.R. § 63.6590(a)(2)(iii), since all the existing engines that caused the facility to be classified as a major source of HAP were retired and the new engines are subject to a FEL below major source thresholds. The RICE NESHAP requirements have been incorporated into Operating Permit 2016-0093-TVR3.

This response has been coordinated with EPA's Office of Enforcement and Quality Assurance (OECA) and Office of Air Quality Planning Standards (OAQPS). If you have any questions or concerns about this determination, please feel free to contact Mr. Brandon Bammel of my staff at (214) 665-8545.

Sincerely,

PBI / Ex. 4

Steve Thompson
Chief,
Air Enforcement Branch

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